

THE HONORABLE MARCIA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

HUONG HOANG, an individual

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

No. 2:11-CV- 01709-MJP

**DECLARATION OF ASHLEY A.
LOCKE IN SUPPORT OF
DEFENDANTS' MOTION TO STRIKE
TRIAL WITNESSES AND TRIAL
EXHIBITS TO CONFORM TO THE
COURT'S PREVIOUS ORDER SETTING
1-2 DAY TRIAL**

I, Ashley A. Locke, hereby declare as follows:

1. I am an associate with Perkins Coie LLP. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. (collectively "Defendants") in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Pretrial Statement, which was served on counsel for Defendants on February 6, 2013.

3. The parties have taken deposition testimony of plaintiff Huong Hoang, Joe Kolkowitz, and three 30(b)(6) witnesses for Defendants.

DECLARATION OF ASHLEY A. LOCKE IN
SUPPORT OF DEFS.' MOT. TO STRIKE (No. CV-
01709-MJP) – 1

24976-0480/LEGAL26021776.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.
3

4
5 DATED: March 14, 2013

6 By: /s/ Ashley A. Locke
7 Ashley A. Locke
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DECLARATION OF ASHLEY A. LOCKE IN SUPPORT
OF DEFS.' MOT. TO STRIKE (No. CV- 01709-MJP) – 2

24976-0480/LEGAL26021776.1

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Phone: 206.359.8000
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CERTIFICATE OF SERVICE

I certify that on March 14, 2013, I electronically filed the foregoing DECLARATION OF ASHLEY LOCKE with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

Derek Alan Newman

Keith Scully

Charlotte Williams

Newman Du Wors LLP

1201 Third Avenue, Ste 1600

Seattle, WA 98101

☐ Via hand delivery
☐ Via U.S. Mail, 1st Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☐ Via Email
☒ Via ECF

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 14th day of March, 2013.

s/ Ashley A. Locke

Ashley Locke, WSBA No. 40521

Perkins Coie LLP

1201 Third Avenue, Suite 4800

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Telephone: 206.359.8000

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E-mail: alocke@perkinscoie.com

Attorneys for Defendants Amazon.com, Inc.
and IMDb.com, Inc.

DECLARATION OF ASHLEY A. LOCKE IN SUPPORT
OF DEFS.' MOT. TO STRIKE (No. CV- 01709-MJP) – 3

Perkins Coie LLP
 1201 Third Avenue, Suite 4800
 Seattle, WA 98101-3099
 Phone: 206.359.8000
 Fax: 206.359.9000

EXHIBIT A

Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

HUONG HOANG, an individual,

Plaintiff,

vs.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

NO. 11-cv-01709-MJP

**PLAINTIFF HUONG HOANG'S
PRETRIAL STATEMENT**

Pursuant to Local Court Rule 16(h), Plaintiff Huong Hoang provides her pretrial statement to Defendants Amazon.com and IMDb.com.

I. FEDERAL JURISDICTION

Jurisdiction is vested in this court by virtue of 28 U.S.C. § 1332, because Plaintiff Hoang is a citizen of a different state than all Defendants and the amount in controversy exceeds \$75,000.

II. CLAIMS FOR RELIEF PLAINTIFF INTENDS TO PURSUE AT TRIAL

Plaintiff Hoang will pursue at trial the following claims: breach of contract and violations of Washington's Consumer Protection Act.

III. ADMITTED FACTS

The following facts are admitted by the parties:

1. Amazon wholly owns IMDb.
2. IMDb provides free access at the website www.imdb.com to the world's largest publicly-accessible database about movies and film and television performers.
3. Amazon directly derives revenue from IMDb's business activities.
4. Amazon provides legal advice and support to IMDb.
5. Amazon advertises extensively on IMDb's website.
6. Amazon and IMDb share credit-card processing and payment systems.
7. IMDb has over 160 million users per month.
8. IMDb features over 130 million data items, including more than 2 million movies, television, and entertainment programs, and over 4 million cast and crew members.
9. IMDb's mobile app has been downloaded over 50 million times.
10. IMDb is used by casting directors and other employers in the film and television industry because it lists productions upon which writers, performers or crew members worked.
11. IMDb markets itself to employers in the film and television industry.
12. Entertainment professionals rely on the exposure provided by IMDb to seek employment opportunities in the entertainment industry.
13. Casting directors, directors, and producers use IMDb to learn about an actor before an audition, and in making casting decisions.
14. IMDb offers a "STARMeter" for each performer that goes up or down based upon the frequency that users search for the performer.
15. Some casting directors advertise acting jobs to performers based on STARMeter ratings.
16. Some acting jobs offer IMDb credits as the only payment for performing in a film.

1 17. IMDb profiles have varying amounts of information about performers.

2 18. Some but not all IMDb profiles list a performer's year or date of birth.

3 19. IMDb attempts to include as much relevant information as possible about
4 each performer listed in IMDb's database.

5 20. IMDb offers a subscription service—IMDb Pro—that it advertises as “[a]n
6 inside view of the entertainment world” that provides “[a]ll the industry information you
7 need at your fingertips.”

8 21. IMDb Pro features job listings, company contact information, and a “people
9 database” for movie-industry professionals.

10 22. In order to subscribe to IMDb Pro, IMDb requires consumers to submit
11 name, address, and credit card information.

12 23. IMDb Pro consumers must accept IMDb Pro's Subscriber Agreement and
13 incorporated Privacy Policy.

14 24. It is not possible for a consumer to sign up for IMDb Pro without providing
15 his or her credit card information and accepting the terms of the Subscriber Agreement.

16 25. IMDb stores the information provided during the subscription process,
17 including consumer credit card information.

18 26. IMDb stores credit-card information about hundreds of thousands of
19 consumers.

20 27. Many IMDb Pro consumers also have IMDb profiles.

21 28. There are fewer acting roles in the television and film industry available for
22 female characters over age 40 than there are younger roles.

23 29. Casting directors review hundreds or thousands of resumes and headshots
24 when considering who to call for an audition.

25 30. Casting directors sometimes use a performer's actual age to filter out some
26 applicants for roles.

27 31. Some IMDb profiles include an actor's purported age, while others do not.

28 32. IMDb gathers most data on the IMDb site from IMDb users.

1 33. IMDb users can submit data anonymously, or using an assumed name.

2 34. IMDb does not routinely verify the identity of individuals submitting data.

3 35. IMDb automatically approves information from a user with a good
4 reputation.

5 36. IMDb does not have criteria establishing which users have good
6 reputations.

7 37. Hoang does not routinely tell anyone other than close friends and family
8 her actual age and does not disclose it on her personal website, resume, or professional
9 correspondence.

10 38. Hoang created an IMDb profile on November 27, 2001 and initially did not
11 provide a birth date.

12 39. On June 15, 2004, Hoang subscribed to IMDb Pro.

13 40. IMDb required Hoang's credit card information in order for Hoang to
14 subscribe. Hoang submitted her full legal name, Huong Thu Hoang, together with her
15 address and credit card number.

16 41. Hoang accepted IMDb's Subscriber Agreement and Privacy Notice when
17 subscribing to IMDb Pro.

18 42. IMDb drafted the Subscriber Agreement and Privacy Notice.

19 43. The Subscriber Agreement states that "Our Privacy Notice is a part of this
20 Agreement and its terms are incorporated herein by this reference."

21 44. Hoang was not able to modify the Subscriber Agreement or Privacy Notice.

22 45. In 2004, Hoang entered 1978 as her year of birth in her profile.

23 46. At no point before Spring 2008 did Hoang supply any documents regarding
24 her birth date or age to IMDb.

25 47. Other than when she subscribed to IMDb Pro, at no point prior to Spring
26 2008 did Hoang supply her full legal name to IMDb.

27 48. Between 2007 and 2009, Hoang repeatedly asked IMDb to remove the
28 information and leave her age unknown like other performers listed in the database.

1 49. IMDb told Hoang that it would not remove her date of birth without proof
2 that it was incorrect.

3 50. In July 2008, IMDb searched for Hoang's actual birth date using publicly-
4 available sources, but was unsuccessful in finding it.

5 51. On November 12, 2008, IMDb conducted a paid search for Hoang's birth
6 date on a restricted database, PrivateEye.com, but was unable to find anyone under the
7 name "June Hoang".

8 52. IMDb then searched for Hoang's legal name in their consumer payment
9 records.

10 53. After locating Hoang's payment records, IMDb searched PrivateEye.com
11 again for Hoang's birth date using Hoang's legal name.

12 54. Once IMDb found Hoang's actual birth date, it published Hoang's birth
13 date on her IMDb profile.

14 55. IMDb never notified Hoang that it conducted searches of her on
15 PrivateEye.com.

16 56. IMDb did not ask Hoang for permission to publish her date of birth.

17 57. IMDb did not ask Hoang for permission to use her legal name to search
18 PrivateEye.com.

19 58. Hoang did not give permission to IMDb to publish her date of birth or to
20 use her legal name to search PrivateEye.com.

21 59. In 2009, Hoang was initially hired to perform in a film called
22 Consequences. The casting director then rejected her as too old after seeing Hoang's age
23 on IMDb.

24 60. On another project cast after IMDb released Hoang's actual age, the casting
25 director rejected Hoang because the director was concerned about the age range.

26 61. For another film, the casting director rejected Hoang shortly after Hoang
27 provided the director with a link to her IMDb profile.

28 62. IMDb's public disclosure of Hoang's age caused Hoang emotional distress.

63. Hoang has seen a therapist, and suffers from daily anxiety and sleep loss.

64. Between January 9, 2008 and March 30, 2009, IMDb conducted 24 different PrivateEye searches of various consumers.

65. From as early as 2010, the Screen Actors Guild and the American Federation of Television and Radio Artists (SAG-AFTRA) have petitioned IMDb to remove birth dates upon request.

66. The Writer's Guild of America and Director's Guild of America have joined SAG-AFTRA in petitioning IMDb to stop its role in age discrimination.

67. Numerous individual performers have also petitioned IMDb to remove their age from public display.

68. IMDb has been involved in between ten and fifteen legal disputes in the last few years relating to it displaying performers' ages.

IV. ISSUES OF LAW

The following are the issues of law to be determined by the Court:

1. A contract is legally binding if it is made between competent parties, contains an offer and acceptance, mutuality of obligation, and is supported by consideration. IMDb's Subscriber Agreement was drafted by IMDb and accepted by Hoang, contains each party's obligations, and is supported by consideration. Is IMDb's Subscriber Agreement a legally binding contract between IMDb and Hoang?

2. A document is incorporated into a contract when the parties clearly and unequivocally incorporate it by reference. IMDb's Subscriber Agreement expressly incorporates the Privacy Notice. Is the Privacy Notice incorporated into the Subscriber Agreement?

3. A Court should grant equitable relief after balancing the interests of the parties. Hoang and similarly-situated actors are immeasurably harmed by disclosure of their age. IMDb will not be appreciably harmed by taking down date of birth information on request. Should the Court require IMDb to remove Plaintiff Hoang's birth date from the "Junie Hoang" IMDb profile and require IMDb to remove birth dates of other

1 individuals at their request?

2 4. The Court may rely on public interest impact in determining whether to
3 award treble damages under Washington's Consumer Protection Act. IMDb's display of
4 dates of birth without consent and using information obtained by breaching consumer
5 contracts potentially harms hundreds of thousands of consumers. Should treble damages
6 be awarded to Hoang under Washington's Consumer Protection Act?

7 5. A limitation of liability clause is unconscionable and unenforceable when it
8 is one-sided or overly harsh, or where a consumer lacks a meaningful choice in accepting
9 it. IMDb's limitation of liability is one-sided, overly harsh because it limits Hoang's
10 remedies to the cost of her subscription regardless of the extent of IMDb's malfeasance,
11 and Hoang had no meaningful choice when she accepted it. Is the limitation of liability
12 clause in IMDb's Subscriber Agreement enforceable against Hoang?

13 6. The equitable doctrine of unclean hands applies only to a plaintiff that
14 fraudulently induced a defendant to enter into a contract, or fraudulently obtained a
15 benefit from the defendant. Hoang's alleged unclean hands did not induce Defendants to
16 enter into a contract nor result in a benefit to Hoang. Does the doctrine of unclean hands
17 bar Hoang from equitable relief?

18 7. Unclean hands is an equitable remedy. Money damages are a remedy at
19 law, not equity. Does the doctrine of unclean hands bar Hoang from recovering money
20 damages?

21 **V. EXPERT WITNESSES**

22 The parties do not offer any testimony from expert witnesses.
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VI. WITNESSES

The names and addresses of witnesses, other than experts, to be used by each party at the time of trial and the general nature of the testimony of each are:

A. On behalf of Plaintiff:

1. **Huong Hoang**

Plaintiff

c/o Newman Du Wors

1201 Third Avenue, Suite 1600

Seattle, Washington 98101

Huong Hoang will testify to her acting career; her practices regarding keeping her age secret; her interactions with IMDb and Amazon; her requests to have IMDb remove her date of birth from her profile; her IMDb profile changing to reflect her actual date of birth; her auditions for acting jobs after her date of birth was disclosed and directors' reactions to her age; IMDb's importance in the acting industry; age discrimination in the acting industry; and her damages.

2. **Joe Kolkowitz**

Player's Talent Agency

16130 Ventura Blvd., Suite 235

Encino, California 91436

Joe Kolkowitz will testify to casting procedures and methods in the entertainment industry; age discrimination in the entertainment industry; IMDb's importance in the entertainment industry; trends in Ms. Hoang's casting success; Ms. Hoang's marketability as an actor before and after her age was disclosed; and casting directors' and directors' reactions to the age of actors.

3. **Jason Cermak**

c/o BLK Management

Les Blackmore

Ste. 600 - 318 Homer Street

Vancouver British Columbia

V6B 2V2

Jason Cermak will testify that he asked IMDb to remove his date of birth and

IMDb refused, and that he has suffered damages as a result of IMDb posting his date of birth. He may also testify about age discrimination in the acting industry, and on the importance of IMDb to casting decisions.

4. Camille Solari

849 S Broadway #808
Los Angeles, California 90014

Camille Solari will testify that she asked IMDb to remove her date of birth and that IMDb refused, that she did not give IMDb permission to use her personal information to search PrivateEye.com, and that she has suffered damages as a result of IMDb posting her date of birth. She may also testify about age discrimination in the acting industry, and on the importance of IMDb to casting decisions.

5. Stacey Newsome

P.O. Box 381161
Las Angeles, CA 90038

Stacey Newsome will testify that she asked IMDb to remove her date of birth and that IMDb refused, that she did not give IMDb permission to use her personal information to search PrivateEye.com, and that she has suffered damages as a result of IMDb posting her date of birth. She may also testify about age discrimination in the acting industry, and on the importance of IMDb to casting decisions.

6. Joan McCall

1437 Rising Glen Rd.
Los Angeles, California 90069

Joan McCall will testify that she asked IMDb to remove her date of birth and that IMDb refused, that she did not give IMDb permission to use her personal information to search PrivateEye.com, and that she has suffered damages as a result of IMDb posting her date of birth. She may also testify about age discrimination in the acting industry, and on the importance of IMDb to casting decisions.

7. Jill Virnig

P.O. Box 27354
Los Angeles, California 90069

Jill Virnig will testify that she asked IMDb to remove her date of birth and that IMDb refused, that she did not give IMDb permission to use her personal information to

1 search PrivateEye.com, and that she has suffered damages as a result of IMDb posting
2 her date of birth. She may also testify about age discrimination in the acting industry, and
3 on the importance of IMDb to casting decisions.

4 **8. Mark Anthony Nacarato**
5 P.O. Box 17418
6 Beverly Hills, California 90209

7 Mark Nacarato will testify that he asked IMDb to remove his date of birth and that
8 IMDb refused, that he did not give IMDb permission to use his personal information to
9 search PrivateEye.com, and that he has suffered damages as a result of IMDb posting his
10 date of birth. He may also testify about age discrimination in the acting industry, and on
11 the importance of IMDb to casting decisions.

12 **9. Mitchell Fink**
13 942 N Curson Ave.
14 Los Angeles, California 90046

15 Mitchell Fink will testify that he asked IMDb to remove his date of birth and that
16 IMDb refused, that he did not give IMDb permission to use his personal information to
17 search PrivateEye.com, and that he has suffered damages as a result of IMDb posting his
18 date of birth. He may also testify about age discrimination in the acting industry, and on
19 the importance of IMDb to casting decisions.

20 **10. Micah Ballinger**
21 450 Piedmont Ave NE #1405
22 Atlanta, Georgia 30308

23 Micah Ballinger will testify that he asked IMDb to remove his date of birth and
24 that IMDb refused, that he did not give IMDb permission to use his personal information
25 to search PrivateEye.com, and that he has suffered damages as a result of IMDb posting
26 his date of birth. He may also testify about age discrimination in the acting industry, and
27 on the importance of IMDb to casting decisions.

28 **11. Scott Cohen**
 1129 E Main St
 Rochester, NY 14609

 Scott Cohen will testify that he asked IMDb to remove his date of birth and that

IMDb refused, that he did not give IMDb permission to use his personal information to search PrivateEye.com, and that he has suffered damages as a result of IMDb posting his date of birth. He may also testify about age discrimination in the acting industry, and on the importance of IMDb to casting decisions.

12. Records custodian, SAG-AFTRA
5757 Wilshire Blvd., 7th Floor
Los Angeles, California 90036-3600

The records custodian will testify to SAG-AFTRA's communications with IMDb and authenticate documents from SAG-AFTRA.

13. Jennifer Ortega
1821 Q Street
Sacramento, California 95811

Jennifer Ortega will authenticate documents from PrivateEye.com.

14. Giancarlo Cairella
IMDb and Amazon Employee
c/o Perkins Coie
1201 Third Avenue, Suite 4900
Seattle, Washington 98101

Giancarlo Cairella will testify to IMDb's and Amazon's policies; IMDb and Amazon's interactions with Ms. Hoang; Ms. Hoang's requests to have IMDb remove her date of birth from her public profile; IMDb's changes to Ms. Hoang's profile to show Ms. Hoang's actual date of birth; IMDb's use of Ms. Hoang's credit card information to find Ms. Hoang's legal name; IMDb's search of PrivateEye.com records to find Ms. Hoang's date of birth; IMDb's policies; IMDb's practice of updating IMDbPro user information.

15. Adrian Garver
Amazon Employee
c/o Perkins Coie
1201 Third Avenue, Suite 4900
Seattle, Washington 98101

Adrian Garver will testify to IMDb's and Amazon's policies; IMDb and Amazon's interactions with Ms. Hoang; Ms. Hoang's requests to have IMDb remove her date of birth from her public profile; IMDb's changes to Ms. Hoang's profile to show Ms. Hoang's actual date of birth; IMDb's use of Ms. Hoang's credit card information to find Ms. Hoang's legal name; IMDb's search of PrivateEye.com records to find Ms. Hoang's

1 date of birth; IMDb's policies; IMDb's practice of updating IMDbPro user information;
2 Amazon's control of IMDb's actions.

3 **16. Thomas Whitcomb**
4 IMDb Employee
5 c/o Perkins Coie
6 1201 Third Avenue, Suite 4900
7 Seattle, Washington 98101

8 Thomas Whitcomb will testify to IMDb's and Amazon's payment processing
9 system; IMDb and Amazon's business relationship; storage of credit card information;
10 and "tokenization" of payment information.

11 **17. David Zapolski**
12 Amazon Employee
13 c/o Perkins Coie
14 1201 Third Avenue, Suite 4900
15 Seattle, Washington 98101

16 David Zapolski will testify to communications with and/or about Hoang.

17 **18. Michelle Wilson**
18 Amazon Employee
19 c/o Perkins Coie
20 1201 Third Avenue, Suite 4900
21 Seattle, Washington 98101

22 Michelle Wilson will testify to communications with and/or about Hoang.

23 **19. Geoff Leonard**
24 Amazon Employee
25 c/o Perkins Coie
26 1201 Third Avenue, Suite 4900
27 Seattle, Washington 98101

28 Geoff Leonard will testify to communications with and/or about Hoang.

In addition to the witnesses listed above, Plaintiff Hoang reserves the right to call
Defendants' witnesses.

VII. PLAINTIFF'S EXHIBITS LIST

Plaintiff proposes the exhibits listed in Exhibit A for use at trial.

VIII. ACTION BY THE COURT

This case is scheduled for trial before a jury on April 8, 2013.

Trial briefs shall be submitted to the court on or before April 3, 2013.

Jury instructions requested by either party shall be submitted to the court on or

1 before April 3, 2012. Suggested questions of either party to be asked of the jury by the
2 court on voir dire shall be submitted to the court on or before April 3, 2012.

3 This order has been approved by the parties as evidenced by the signatures of their
4 counsel. This order shall control the subsequent course of the action unless modified by a
5 subsequent order. This order shall not be amended except by order of the court pursuant
6 to agreement of the parties or to prevent manifest injustice.

7
8 Dated this 6th day of February, 2013.

9 **NEWMAN DU WORS LLP**

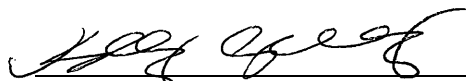
10
11 By: 
12 Derek Newman, WSBA No. 26967
13 Keith Scully, WSBA No. 28677
14 Charlotte Williams, WSBA No. 42864
15 Attorneys for Plaintiff
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Exhibit A

PLAINTIFF'S TRIAL EXHIBITS

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
1	Hoang 000066	03/14/2012	Amazon account billing information for Hoang		
2	Amazon 000046	06/14/2012	Amazon Customer Addresses for "junie hoang"/juniehoang@hotmail.com/customer since 11/16/02		
3	Amazon 000032-41	05/31/2012	Amazon Customer Information for "Huong Hoang"/nexusfilms@hotmail.com/customer since: 2/9/03; Nickname: nexusfilms2"		
4	Amazon 000012-21	05/31/2012	Amazon Customer Information for "Huong Thu Hoang"/juniehoang@yahoo.com/customer since 10/1/08		
5	Amazon 000022-31	05/31/2012	Amazon Customer Information for "Junie Hoang"/junie@juniehoang.com/Nickname: junie127"		
6	Amazon 000002-11	05/31/2012	Amazon Customer Information for "junie hoang"/juniehoang@hotmail.com/customer since 11/16/02		
7	Amazon 000047-98	06/25/2012	Amazon Customer Order Details for various accounts		
8	Amazon 000042-43	06/14/2012	Amazon Customer Orders for "junie hoang"/juniehoang@hotmail.com/customer since 11/16/02		
9	Amazon 000044-45	06/14/2012	Amazon Customer Payment Methods for "junie hoang"/juniehoang@hotmail.com/customer since 11/16/02		
10	IMDb 000001-08	04/28/1998	Amazon's Form 8-K filing		
11	Hoang 000140-42	04/03/2003	Amazon's Privacy Notice		
12	IMDb 001055	05/04/2011	Ancestry.com – Report for "Huong Thu Hoang"		
13	Hoang 000191-95		Call sheets for various acting jobs		
14	Hoang 000189	05/31/2012	Check to Hoang for \$109.09 for shooting fee		
15	Hoang 000188	04/16/2012	Check to Hoang for \$150 for shooting fee		
16	Hoang 000069	07/02/2002	Credit card invoice showing Hoang's transaction with Amazon		
17	Hoang 000068	08/06/2004	Credit card invoice showing Hoang's transaction with Amazon		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
18	Hoang 000067	04/07/2005	Credit card invoice showing Hoang's transaction with Amazon		
19		01/14/2009	Email exchange between Camille Solari and Helpdesk		
20		04/12/2009	Email exchange between Camille Solari and Helpdesk		
21		02/13/2010	Email exchange between Camille Solari and Helpdesk		
22		04/06/2011	Email exchange between contact@astrotheme.com and Hoang		
23	IMDb 000024	07/16/2008	Email exchange between Geoff Leonard and Giancarlo Cairella		
24	IMDb 001038	04/20/2003	Email exchange between Helpdesk and Hoang		
25	IMDb 001039	08/12/2003	Email exchange between Helpdesk and Hoang		
26	IMDb 001040	03/22/2004	Email exchange between Helpdesk and Hoang		
27	IMDb 001009	11/29/2004	Email exchange between Helpdesk and Hoang		
28	IMDb 001032-33	09/15/2008	Email exchange between Helpdesk and Hoang		
29	IMDb 001037	11/29/2008	Email exchange between Helpdesk and Hoang		
30	Kolkowski 000057-59 ¹	08/16/2009	Email exchange between Helpdesk and Hoang		
31	Kolkowski 000116	01/15/2007	Email exchange between Hoang and Kolkowitz		
32	Kolkowski 000115	01/29/2007	Email exchange between Hoang and Kolkowitz		
33	Kolkowski 000056	08/26/2009	Email exchange between Hoang and Kolkowitz		
34	Kolkowski 000054	09/25/2009	Email exchange between Hoang and Kolkowitz		
35	Kolkowski 000051	10/29/2009	Email exchange between Hoang and Kolkowitz		
36	Kolkowski 000055	11/04/2009	Email exchange between Hoang and Kolkowitz		
37	Kolkowski 000042	05/21/2010	Email exchange between Hoang and Kolkowitz		
38	Kolkowski 000040	05/22/2010	Email exchange between Hoang and Kolkowitz		
39	Hoang 000689-90	06/05/2012	Email exchange between Jason Cermak and Helpdesk		

¹ Joe Kolkowitz's documents bear the Bates stamp "Kolkowski".

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
40	Hoang 000680	07/31/2012	Email exchange between Jason Cermak and Hoang		
41	Hoang 000688-90	08/02/2012	Email exchange between Jason Cermak and Hoang with attachments		
42	Kolkowski 000109	05/25/2007	Email exchange between Kolkowitz and Hoang		
43	Kolkowski 000081	03/03/2008	Email exchange between Kolkowitz and Hoang		
44		01/07/2009	Email exchange between Melissa Falcigno and Hoang		
45		04/06/2011	Email from Chris Richmond to Hoang		
46		04/08/2011	Email from Content Requests to Hoang		
47	Hoang 000120-24	07/12/2012	Email from Dov Szego to Jennifer Oretaga of Private Eye re Doe v. Amazon		
48	Hoang 000127	07/12/2012	Email from Dov Szego to Jennifer Oretaga of Private Eye re Doe v. Amazon		
49	IMDb 000967	09/18/2004	Email from Helpdesk to Hoang		
50	IMDb 001007	11/22/2004	Email from Helpdesk to Hoang		
51	IMDb 001008	11/22/2004	Email from Helpdesk to Hoang		
52	IMDb 000958	06/27/2006	Email from Helpdesk to Hoang		
53	IMDb 000966	02/07/2007	Email from Helpdesk to Hoang		
54	IMDb 000976	12/24/2007	Email from Helpdesk to Hoang		
55	IMDb 000977	12/25/2007	Email from Helpdesk to Hoang		
56	IMDb 000978	12/26/2007	Email from Helpdesk to Hoang		
57	IMDb 000979	12/27/2007	Email from Helpdesk to Hoang		
58	IMDb 000980	12/28/2007	Email from Helpdesk to Hoang		
59	IMDb 000987	12/29/2007	Email from Helpdesk to Hoang		
60	IMDb 001010	01/01/2008	Email from Helpdesk to Hoang		
61	IMDb 000981	01/05/2008	Email from Helpdesk to Hoang		
62	IMDb 000982	01/12/2008	Email from Helpdesk to Hoang		
63	IMDb 001019	01/28/2008	Email from Helpdesk to Hoang		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
64	IMDb 001020	02/25/2008	Email from Helpdesk to Hoang		
65	IMDb 000983	03/25/2008	Email from Helpdesk to Hoang		
66	IMDb 001011	04/06/2008	Email from Helpdesk to Hoang		
67	IMDb 001021	04/25/2008	Email from Helpdesk to Hoang		
68	IMDb 001022	05/12/2008	Email from Helpdesk to Hoang		
69	IMDb 000984	09/15/2008	Email from Helpdesk to Hoang		
70	IMDb 000985	09/15/2008	Email from Helpdesk to Hoang		
71	IMDb 000986	09/25/2008	Email from Helpdesk to Hoang		
72	IMDb 001034	10/02/2008	Email from Helpdesk to Hoang		
73	IMDb 001023	01/27/2009	Email from Helpdesk to Hoang		
74	IMDb 001024	01/27/2009	Email from Helpdesk to Hoang		
75	IMDb 000988	02/26/2009	Email from Helpdesk to Hoang		
76	IMDb 000989	02/27/2009	Email from Helpdesk to Hoang		
77	IMDb 000990	03/03/2009	Email from Helpdesk to Hoang		
78	IMDb 000991	03/09/2009	Email from Helpdesk to Hoang		
79	IMDb 000992	03/17/2009	Email from Helpdesk to Hoang		
80	IMDb 000993	03/31/2009	Email from Helpdesk to Hoang		
81	IMDb 000994	04/01/2009	Email from Helpdesk to Hoang		
82	IMDb 000995	04/08/2009	Email from Helpdesk to Hoang		
83	IMDb 000996	04/15/2009	Email from Helpdesk to Hoang		
84	IMDb 000998	06/27/2009	Email from Helpdesk to Hoang		
85	IMDb 000997	06/28/2009	Email from Helpdesk to Hoang		
86	IMDb 000964	10/06/2009	Email from Helpdesk to Hoang		
87	IMDb 001012	01/17/2010	Email from Helpdesk to Hoang		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
88	IMDb 001025	04/18/2010	Email from Helpdesk to Hoang		
89	IMDb 001026-27	04/18/2010	Email from Helpdesk to Hoang		
90	IMDb 001028	04/30/2010	Email from Helpdesk to Hoang		
91	IMDb 001000	05/24/2010	Email from Helpdesk to Hoang		
92	IMDb 001001	06/23/2010	Email from Helpdesk to Hoang		
93	IMDb 001002	06/24/2010	Email from Helpdesk to Hoang		
94	IMDb 001003	06/28/2010	Email from Helpdesk to Hoang		
95	IMDb 001004	09/28/2010	Email from Helpdesk to Hoang		
96	IMDb 000965	03/02/2011	Email from Helpdesk to Hoang		
97	IMDb 001005	06/23/2011	Email from Helpdesk to Hoang		
98	IMDb 001006	06/29/2011	Email from Helpdesk to Hoang		
99	IMDb 001033	10/24/2011	Email from Helpdesk to Hoang		
100	IMDb 000948-49	02/20/2003	Email from Hoang to Helpdesk		
101	IMDb 000950-51	02/20/2003	Email from Hoang to Helpdesk		
102	IMDb 001038	04/20/2003	Email from Hoang to Helpdesk		
103	IMDb 001039	08/12/2003	Email from Hoang to Helpdesk		
104	IMDb 001040	03/22/2004	Email from Hoang to Helpdesk		
105	IMDb 001029	03/23/2004	Email from Hoang to Helpdesk		
106	IMDb 000952	08/21/2004	Email from Hoang to Helpdesk		
107	IMDb 000968-69	10/13/2004	Email from Hoang to Helpdesk		
108	IMDb 001030	11/04/2004	Email from Hoang to Helpdesk		
109	IMDb 000953	11/13/2004	Email from Hoang to Helpdesk		
110	IMDb 000954	11/15/2004	Email from Hoang to Helpdesk		
111	IMDb 001042	11/16/2004	Email from Hoang to Helpdesk		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
112	IMDb 000970	11/17/2004	Email from Hoang to Helpdesk		
113	IMDb 000971	11/17/2004	Email from Hoang to Helpdesk		
114	IMDb 000972	11/18/2004	Email from Hoang to Helpdesk		
115	IMDb 000973-74	11/18/2004	Email from Hoang to Helpdesk		
116	IMDb 001031	12/13/2004	Email from Hoang to Helpdesk		
117	IMDb 001041	12/15/2004	Email from Hoang to Helpdesk		
118	IMDb 000975	06/08/2005	Email from Hoang to Helpdesk		
119	IMDb 000955	08/06/2005	Email from Hoang to Helpdesk		
120	IMDb 000956-97	09/23/2005	Email from Hoang to Helpdesk		
121	IMDb 000959	09/20/2006	Email from Hoang to Helpdesk		
122	IMDb 000960	01/01/2008	Email from Hoang to Helpdesk		
123	IMDb 001015	03/26/2008	Email from Hoang to Helpdesk		
124	IMDb 001013	03/26/2008	Email from Hoang to Helpdesk		
125	IMDb 001014	03/27/2008	Email from Hoang to Helpdesk		
126	IMDb 000961	04/20/2008	Email from Hoang to Helpdesk		
127	IMDb 001050-52	07/11/2008	Email from Hoang to Helpdesk		
128	IMDb 000945-46	08/02/2008	Email from Hoang to Helpdesk		
129	IMDb 000962	09/15/2008	Email from Hoang to Helpdesk		
130	Kolkowski 000069	10/17/2008	Email from Hoang to Helpdesk		
131	IMDb 000963	11/14/2008	Email from Hoang to Helpdesk		
132	IMDb 001035-36	11/27/2008	Email from Hoang to Helpdesk		
133	IMDb 000947	02/28/2009	Email from Hoang to Helpdesk		
134	Kolkowski 000062	04/30/2009	Email from Hoang to Helpdesk		
135	IMDb 001016-17	01/17/2010	Email from Hoang to Helpdesk		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
136	IMDb 001018	01/18/2010	Email from Hoang to Helpdesk		
137	Kolkowski 000068	12/12/2008	Email from Hoang to Kolkowitz		
138	Kolkowski 000067	12/22/2008	Email from Hoang to Kolkowitz		
139	Kolkowski 000066	03/01/2009	Email from Hoang to Kolkowitz		
140	Kolkowski 000044	03/25/2010	Email from Hoang to Kolkowitz		
141	Kolkowski 000043	04/23/2010	Email from Hoang to Kolkowitz		
142	Kolkowski 000041	05/22/2010	Email from Hoang to Kolkowitz		
143	Kolkowski 000039	06/10/2010	Email from Hoang to Kolkowitz		
144	Kolkowski 000037	06/30/2010	Email from Hoang to Kolkowitz		
145	Kolkowski 000036	08/10/2010	Email from Hoang to Kolkowitz		
146	Kolkowski 000035	11/24/2010	Email from Hoang to Kolkowitz		
147	Kolkowski 000034	12/23/2010	Email from Hoang to Kolkowitz		
148	Kolkowski 000024	05/26/2011	Email from Hoang to Kolkowitz		
149	Kolkowski 000023	06/12/2011	Email from Hoang to Kolkowitz		
150	Kolkowski 000021	07/05/2011	Email from Hoang to Kolkowitz		
151	Kolkowski 000022	07/21/2011	Email from Hoang to Kolkowitz		
152	Kolkowski 000016	08/28/2011	Email from Hoang to Kolkowitz		
153	Kolkowski 000015	09/06/2011	Email from Hoang to Kolkowitz		
154	Kolkowski 000013	11/23/2011	Email from Hoang to Kolkowitz		
155	Kolkowski 000011	12/16/2011	Email from Hoang to Kolkowitz		
156	Kolkowski 000012	12/16/2011	Email from Hoang to Kolkowitz		
157	IMDb 000999	03/30/2010	Email from IMDb to Huong		
158	IMDb 001091-92	12/22/2008	Email from Jalene Mack to Helpdesk		
159	Hoang 000110-111	07/12/2012	Email from Jennifer Ortega of Private Eye to Dov Szego re Doe v. Amazon		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
160	Hoang 000125-26	07/12/2012	Email from Jennifer Ortega of Private Eye to Dov Szego re Doe v. Amazon		
161	Hoang 000136-37	05/17/2011	Email from Kalli Jackson at Dozier to Amazon (David Zapolsky) attached correspondence from John Dozier		
162	Kolkowski 000114	02/14/2007	Email from Kolkowitz to Hoang		
163	Kolkowski 000112-13	04/20/2007	Email from Kolkowitz to Hoang		
164	Kolkowski 000111	05/09/2007	Email from Kolkowitz to Hoang		
165	Kolkowski 000110	05/15/2007	Email from Kolkowitz to Hoang		
166	Kolkowski 000108	06/07/2007	Email from Kolkowitz to Hoang		
167	Kolkowski 000107	06/22/2007	Email from Kolkowitz to Hoang		
168	Kolkowski 000104	07/30/2007	Email from Kolkowitz to Hoang		
169	Kolkowski 000105-06	07/30/2007	Email from Kolkowitz to Hoang		
170	Kolkowski 000103	08/09/2007	Email from Kolkowitz to Hoang		
171	Kolkowski 000102	08/14/2007	Email from Kolkowitz to Hoang		
172	Kolkowski 000100	08/24/2007	Email from Kolkowitz to Hoang		
173	Kolkowski 000101	08/24/2007	Email from Kolkowitz to Hoang		
174	Kolkowski 000096-97	09/24/2007	Email from Kolkowitz to Hoang		
175	Kolkowski 000098-99	09/24/2007	Email from Kolkowitz to Hoang		
176	Kolkowski 000095	10/17/2007	Email from Kolkowitz to Hoang		
177	Kolkowski 000094	10/18/2007	Email from Kolkowitz to Hoang		
178	Kolkowski 000093	10/26/2007	Email from Kolkowitz to Hoang		
179	Kolkowski 000092	11/16/2007	Email from Kolkowitz to Hoang		
180	Kolkowski 000090-91	11/17/2007	Email from Kolkowitz to Hoang		
181	Kolkowski 000089	12/12/2007	Email from Kolkowitz to Hoang		
182	Kolkowski 000087-88	01/17/2008	Email from Kolkowitz to Hoang		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
183	Kolkowski 000086	01/18/2008	Email from Kolkowitz to Hoang		
184	Kolkowski 000085	02/11/2008	Email from Kolkowitz to Hoang		
185	Kolkowski 000082	02/22/2008	Email from Kolkowitz to Hoang		
186	Kolkowski 000080	03/18/2008	Email from Kolkowitz to Hoang		
187	Kolkowski 000078-79	04/16/2008	Email from Kolkowitz to Hoang		
188	Kolkowski 000077	05/16/2008	Email from Kolkowitz to Hoang		
189	Kolkowski 000074-75	08/04/2008	Email from Kolkowitz to Hoang		
190	Kolkowski 000076	08/04/2008	Email from Kolkowitz to Hoang		
191	Kolkowski 000073	08/06/2008	Email from Kolkowitz to Hoang		
192	Kolkowski 000072	09/12/2008	Email from Kolkowitz to Hoang		
193	Kolkowski 000071	09/16/2008	Email from Kolkowitz to Hoang		
194	Kolkowski 000070	10/01/2008	Email from Kolkowitz to Hoang		
195	Kolkowski 000064	03/19/2009	Email from Kolkowitz to Hoang		
196	Kolkowski 000063	04/02/2009	Email from Kolkowitz to Hoang		
197	Kolkowski 000065	04/04/2009	Email from Kolkowitz to Hoang		
198	Kolkowski 000061	05/05/2009	Email from Kolkowitz to Hoang		
199	Kolkowski 000060	05/20/2009	Email from Kolkowitz to Hoang		
200	Kolkowski 000053	10/01/2009	Email from Kolkowitz to Hoang		
201	Kolkowski 000052	10/13/2009	Email from Kolkowitz to Hoang		
202	Kolkowski 000048	11/20/2009	Email from Kolkowitz to Hoang		
203	Kolkowski 000049	11/20/2009	Email from Kolkowitz to Hoang		
204	Kolkowski 000046	11/23/2009	Email from Kolkowitz to Hoang		
205	Kolkowski 000047	11/23/2009	Email from Kolkowitz to Hoang		
206	Kolkowski 000045	03/17/2010	Email from Kolkowitz to Hoang		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
207	Kolkowski 000038	06/29/2010	Email from Kolkowitz to Hoang		
208	Kolkowski 000032	01/03/2011	Email from Kolkowitz to Hoang		
209	Kolkowski 000033	01/03/2011	Email from Kolkowitz to Hoang		
210	Kolkowski 000030	01/13/2011	Email from Kolkowitz to Hoang		
211	Kolkowski 000031	01/13/2011	Email from Kolkowitz to Hoang		
212	Kolkowski 000029	01/25/2011	Email from Kolkowitz to Hoang		
213	Kolkowski 000028	03/15/2011	Email from Kolkowitz to Hoang		
214	Kolkowski 000027	03/30/2011	Email from Kolkowitz to Hoang		
215	Kolkowski 000026	05/09/2011	Email from Kolkowitz to Hoang		
216	Kolkowski 000025	05/17/2011	Email from Kolkowitz to Hoang		
217	Kolkowski 000018-20	07/26/2011	Email from Kolkowitz to Hoang		
218	Kolkowski 000017	08/26/2011	Email from Kolkowitz to Hoang		
219	Kolkowski 000014	09/13/2011	Email from Kolkowitz to Hoang		
220	Kolkowski 000003-4	04/20/2012	Email from Kolkowitz to Hoang		
221	Kolkowski 000005-6	04/20/2012	Email from Kolkowitz to Hoang		
222	Kolkowski 000002	07/11/2012	Email from Kolkowitz to Hoang		
223		04/11/2011	Email from Malwina Grochowska to Hoang		
224		12/02/2012	Email from Marlu Harris to Hoang		
225			Emails from people asking for Hoang's signature		
226		08/02/2012	Exhibit 1 from Adrian Garver 30(b)(6) Deposition on 8-2-12 – Notice of FRCP Rule 30(b)(6) Deposition of Amazon.com, Inc.		
227		08/01/2012	Exhibit 1 from Adrian Garver Deposition on 8-1-12 – E-mail from Kathryn Sheehan to Giancarlo Cairella dated 11-12-08		
228		08/03/2012	Exhibit 1 from Amazon (Thomas Whitcomb) 30(b)(6) Deposition 8-3-12 – Notice of FRCP Rule 30(b)(6) Deposition of Amazon.com, Inc.		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
229		08/02/2012	Exhibit 1 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – Notice of FRCP Rule 30(b)(6) Deposition of IMDb.com, Inc.		
230		08/01/2012	Exhibit 1 from Giancarlo Cairella Deposition on 8-1-12 – IMDb.com, Inc.'s Second Supplemental Answers and Objections to Plaintiff Huong Hoang's First Set of Interrogatories to Defendant IMDb.com Inc.		
231		08/03/2012	Exhibit 1 from IMDb (Thomas Whitcomb) 30(b)(6) Deposition 8-3-12 – Notice of FRCP Rule 30(b)(6) Deposition of IMDb.com, Inc.		
232		08/01/2012	Exhibit 10 from Giancarlo Cairella Deposition on 8-1-12 – IPS log detailing changes that were made to Ms. Hoang's account in 2004		
233		08/01/2012	Exhibit 11 from Giancarlo Cairella Deposition on 8-1-12 – LinkedIn profile for Giancarlo Cairella		
234		08/02/2012	Exhibit 2 from Adrian Garver 30(b)(6) Deposition on 8-2-12 – Amazon.com Privacy Notice		
235		08/01/2012	Exhibit 2 from Adrian Garver Deposition on 8-1-12 – Amazon.com, Inc.'s Second Supplemental Answers and Objections to Plaintiff Huong Hoang's First Set of Interrogatories to Defendant Amazon.com, Inc.		
236		08/03/2012	Exhibit 2 from Amazon (Thomas Whitcomb) 30(b)(6) Deposition 8-3-12 – Amazon.com, Inc.'s Second Supplemental Answers and Objections to Plaintiff Huong Hoang's First Set of Interrogatories to Defendant Amazon.com, Inc.		
237		08/02/2012	Exhibit 2 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – IMDbPro Subscriber Agreement		
238		08/01/2012	Exhibit 2 from Giancarlo Cairella Deposition on 8-1-12 – Declaration of Giancarlo Cairella in Support of Defendant's Motion to Dismiss Pursuant to Rule 10(a)		
239		08/03/2012	Exhibit 2 from IMDb (Thomas Whitcomb) 30(b)(6) Deposition 8-3-12 – Printout of log accesses to IPS tool		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
240		08/01/2012	Exhibit 3 from Adrian Garver Deposition on 8-1-12 – IMDb.com’s Second Supplemental Answers and Objections to Plaintiff Huong Hoang’s First Set of Interrogatories to Defendant IMDb.com Inc.		
241		08/02/2012	Exhibit 3 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – IMDbPro Privacy Policy		
242		08/01/2012	Exhibit 3 from Giancarlo Cairella Deposition on 8-1-12 – User registration record for IMDb.com for Junie Hoang		
243		08/03/2012	Exhibit 3 from IMDb (Thomas Whitcomb) 30(b)(6) Deposition 8-3-12 – IMDb.com, Inc.’s Second Supplemental Answers and Objections to Plaintiff Huong Hoang’s First Set of Interrogatories to Defendant IMDb.com, Inc.		
244		08/02/2012	Exhibit 4 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – IMDbPro Privacy Policy, Information You Give Us and how We might Use it		
245		08/01/2012	Exhibit 4 from Giancarlo Cairella Deposition on 8-1-12 – E-mail from Geoff Leonard to Giancarlo Cairella dated 7-16-08		
246		08/02/2012	Exhibit 5 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – E-mail from Kathryn Sheehan to Giancarlo Cairella and Adrian Garver dated 11-12-08		
247		08/01/2012	Exhibit 5 from Giancarlo Cairella Deposition on 8-1-12 – E-mail from Kathryn Sheehan to Giancarlo Cairella and Adrian Garver dated 11-12-08		
248		08/02/2012	Exhibit 6 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – PrivateEye.com account information for Giancarlo Cairella		
249		08/01/2012	Exhibit 6 from Giancarlo Cairella Deposition on 8-1-12 – PeopleFinders Account Information for Giancarlo Cairella		
250		08/02/2012	Exhibit 7 from Giancarlo Cairella 30(b)(6) Deposition of 8-2-12 – Sign-up page and information pages from IMDbPro.com’s Web site		
251		08/01/2012	Exhibit 7 from Giancarlo Cairella Deposition on 8-1-12 – Printout of log accesses to IPS tool		
252		08/01/2012	Exhibit 8 from Giancarlo Cairella Deposition on 8-1-12 – Various e-mails to Huong Thu Hoang from IMDb Help Desk		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
253		08/01/2012	Exhibit 9 from Giancarlo Cairella Deposition on 8-1-12 – Various e-mails to Ms. Hoang from IMDb Help Desk		
254	Hoang 000667		Facebook Message from Cokonutree		
255	Hoang 000666		Facebook Message from Jay DeSoto		
256	Hoang 000665		Facebook Post to Junie Hoang from Erin Roberts		
257	Hoang 000664		Facebook Post to Junie Hoang from Kevin Nguyen		
258	Hoang 000668-70		Facebook Posts on Hoang's page		
259			Facebook Profile for "Mary Nguyen" – Biographical Info		
260			Facebook Profile for "Mary Nguyen" – Photo Stream		
261			Facebook Profile for "Mary Nguyen" – Profile Page		
262	Hoang 000046	2010	Hoang's 1090 Form from AKA LSS		
263	Hoang 000045	2010	Hoang's 1090 Form from Dorothy Day Otis Partners		
264			Hoang's Casting Frontier Account profile		
265		11/25/2012	Hoang's Notes on IMDb Filmography		
266	Amazon 000099-112		Hoang's order history with Amazon		
267	Hoang 000198-99		Hoang's Resume		
268		12/17/2012	Hoang's updated list of projects based on year		
269	Hoang 000048	2010	Hoang's W-2 for American Residuals \$ Talent		
270	Hoang 000031	2008	Hoang's W-2 for American Residuals & Talent		
271	Hoang 000033	2008	Hoang's W-2 for Artists Paymaster Service		
272	Hoang 000057	2011	Hoang's W-2 for Empire Films, Inc.; W-2 for American Residuals & Talent		
273	Hoang 000047	2010	Hoang's W-2 for Film Payment Services, Inc.		
274	Hoang 000034	2008	Hoang's W-2 for GEP ATL, LLC		
275	Hoang 000032	2008	Hoang's W-2 for Production Processing Inc		
276	Hoang 000056	2011	Hoang's W-2 for Production Processing, Inc.		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
277	Hoang 000044	2009	Hoang's W-2 for Reyna Sound and Stage		
278	Hoang 000039	2009	Hoang's W-2 for Talent, Entertainment and Media Services		
279	Hoang 000043	2009	Hoang's W-4 and W-2 for PDSI, Inc.		
280	IMDb 000029-30	06/15/2004	IMDb Copyright and Conditions of Use		
281	IMDb 000049-50	03/30/2011	IMDb Copyright and Conditions of Use		
282			IMDb Photos for Junie Hoang		
283	IMDb 002572	10/15/2004	IMDb refund to Huong Thu Hoang <juniehoang@hotmail.com>		
284	IMDb 002573	11/21/2004	IMDb refund to Huong Thu Hoang <juniehoang@hotmail.com>		
285			IMDb Resume for Junie Hoang		
286	IMDb 002567-70	04/27/2012	IMDb System Log for Huong Thu Hoang <juniehoang@hotmail.com>		
287	Hoang 000001	03/06/2011	IMDb Updating Information for Hoang		
288	Hoang 000146		IMDb Webpage - Is my credit card secure? Link		
289	Hoang 000147-50		IMDb Webpage - Privacy Policy Link		
290	Hoang 000151		IMDb Webpage - Second "click here" link landing page from Privacy Policy		
291	Hoang 000152-58		IMDb Webpage - Subscriber Agreement link for IMDbPro		
292	IMDb 000278-944		IMDb's log of account changes to Hoang's IMDb Profile		
293	IMDb 001106-2565		IMDb's log of changes to Hoang's IMDb profile		
294	IMDb 001098-1101	06/03/2004	IMDbPro Subscriber Agreement		
295	Hoang 000159-61	03/29/2010	IMDbPro Subscriber Agreement		
296	IMDb 001094-97	5/18/2012	IMDbPro Subscriber Agreement		
297	IMDb 001087-90	03/27/2012	IPS Access Log up to 27 March 2012		
298	Hoang 000200-564		Junie Hoang's Actors Access account with submission history		
299	Hoang 000682-83		Junie Hoang's Casting Frontier resume		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
300	Hoang 000684		Junie Hoang's Facebook page		
301	Hoang 000681		Junie Hoang's head shot		
302	IMDb 000009-11	10/20/2011	Junie Hoang's IMDb Resume		
303	Hoang 000685		Junie Hoang's LinkedIn page		
304	Hoang 000686		Junie Hoang's Myspace page		
305	Hoang 000687		Junie Hoang's Twitter page		
306	IMDb 000067	05/10/2011	Letter from Amazon (David Zapolsky) to Dozier		
307	IMDb 000064	05/04/2011	Letter from Dozier to Amazon (Michelle Wilson)		
308		01/03/2012	Letter from Jonathan Baum to Counsel		
309	Hoang 000112-19		Letter from Private Eye (Jennifer Oretaga) to Dov Szego		
310	IMDb 001044-45	07/11/2008	Letter to Amazon from Jalene M. Mack		
311	IMDb 001046-49	12/16/2008	Letter to Amazon from Jalene M. Mack		
312	Hoang 000130	07/17/2012	LinkedIn Profile for Adrian Garver		
313	Hoang 000131	07/17/2012	LinkedIn Profile for Geoff Leonard		
314	Hoang 000128-29	07/17/2012	LinkedIn Profile for Giancarlo Cairella		
315	Hoang 000190		List of entertainment employment websites used by Hoang		
316	Hoang 000671-73		Messages between Hoang and Melissa Page on Facebook		
317			Online petition to removing birthdates and age from IMDB		
318	Hoang 000113-14		Peoplefinder – Account information for Giancarlo Cairella		
319	Hoang 000115-19		Peoplefinder – Giancarlo's credit card history for searches		
320	IMDb 001103-04	07/13/2012	PrivateEye Account information for Giancarlo Cairella		
321	Hoang 000138-39	07/17/2012	PrivateEye.com – People Search Results for "June Hoang"		
322	IMDb 001074	10/18/2011	PrivateEye.com – Report for people search "Hoang born 7/16/1967"		
323	IMDb 001057	10/18/2011	PrivateEye.com – Report for people search "Hoang born 7/16/1968"		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
324	IMDb 001075	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1968”		
325	IMDb 001058	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1969”		
326	IMDb 001076	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1969”		
327	IMDb 001059	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1970”		
328	IMDb 001077	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1970”		
329	IMDb 001060	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1971”		
330	IMDb 001078	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1971”		
331	IMDb 001061	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1972”		
332	IMDb 001079	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1972”		
333	IMDb 001062-63	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1973”		
334	IMDb 001080	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1973”		
335	IMDb 001064-65	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1974”		
336	IMDb 001081	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1974”		
337	IMDb 001066-67	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1975”		
338	IMDb 001082	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1975”		
339	IMDb 001068-69	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1976”		
340	IMDb 001083	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1976”		
341	IMDb 001070-71	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1977”		
342	IMDb 001084	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1977”		
343	IMDb 001072-73	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1978”		
344	IMDb 001085	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1978”		
345	IMDb 001053-54	11/12/2008	PrivateEye.com – Report for people search “Hoang, Huong Thu”		
346	IMDb 001086	10/18/2011	PrivateEye.com – Report for people search “Hoang, Phong Tung”		
347	IMDb 001056	10/18/2011	PrivateEye.com – Report for people search “Hoang born 7/16/1967”		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
348			PrivateEye.com – Terms and Conditions		
349	Hoang 000030	03/25/2008	Reciept from IMDb – Hoang’s purchase of Pro-Annual		
350		11/01/2011	Report from SAG Research \$ Economic Department		
351	Hoang 000144-45		Signup information for IMDbPro		
352	IMDb 002571	06/22/2004	Subscription cancellation by Huong Thu Hoang <juniehoang@hotmail.com>		
353	Hoang 000164-66		Summary of income from entertainment work based on category (ie commercial, film, etc)		
354	Amazon 000114-16		Table of IMDb employees with access to the CSC database since October 18, 2005		
355		06/17/2010	The Wrap, “EXCLUSIVE” Battle Raging Over Age Listings on IMDb”		
356		01/22/2010	The Wrap, “TV Writers’ Age Discrimination Suit Settles for \$70M”		
357	IMDb 000014-23	04/25/2012	User Registration Admin for juniehoang@hotmail.com		
358	IMDb 000012-13	04/25/2012	Vertigo’s (Caircella) user status for Juniehoang@hotmail.com listing suspected submissions for the account		
359	IMDb 001093		Voicemail from Jalene Mack to the IMDb		
360		09/5/2012	Webpage from Actors Access – job requiring starmeter rating		
361	Hoang 000170-85		Webpage from Actors Access – Junie Hoang’s account with casting (audition) schedule		
362	Hoang 000186		Webpage from Casting Frontier – Junie Hoang’s Confirm Times		
363	Hoang 000565-88		Webpage from Casting Frontier - Public Submissions Board		
364	Hoang 000589-94		Webpage from Casting Networks Incorporated – Casting Billboard		
365	Hoang 000595-600		Webpage from Casting Networks Incorporated – Casting Billboard with notes		
366			Webpage from IMDb – Carin Chea Profile		
367			Webpage from IMDb – Allisun Sturges Profile		
368			Webpage from IMDb – Anthony Nacarato Profile		
369			Webpage from IMDb – Camille Solari Profile		
370			Webpage from IMDb – Christopher Lambert Profile		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
371	IMDb 000056-57		Webpage from IMDb – Contributor Zone		
372	IMDb 000053-54		Webpage from IMDb – Contributors' Charter		
373	IMDb 000055		Webpage from IMDb – Correcting/Auditing Existing Data		
374			Webpage from IMDb – Dana Eskelson Profile		
375			Webpage from IMDb – Daniel Sauli Profile		
376			Webpage from IMDb – David Warner Profile		
377			Webpage from IMDb – David Warshofsky Profile		
378			Webpage from IMDb – Deanna Russo Profile		
379			Webpage from IMDb – Dianne Zaremba Profile		
380			Webpage from IMDb – Hilary Shepard Profile		
381	IMDb 000063		Webpage from IMDb – How/where you get your information? How accurate/reliable is it?		
382	IMDb 000035-36	02/09/2008	Webpage from IMDb – IMDb Copyright and Conditions of Use		
383	IMDb 000037-40	02/25/2008	Webpage from IMDb – IMDb Copyright and Conditions of Use		
384	IMDb 000025-26	06/11/2004	Webpage from IMDb – IMDb Privacy Notice		
385	IMDb 000027-28	11/12/2004	Webpage from IMDb – IMDb Privacy Notice		
386	IMDb 000031-32	01/04/2007	Webpage from IMDb – IMDb Privacy Notice		
387	IMDb 000033-34	08/18/2007	Webpage from IMDb – IMDb Privacy Notice		
388	IMDb 000041-42	03/25/2008	Webpage from IMDb – IMDb Privacy Notice		
389	IMDb 000043-44	12/20/2009	Webpage from IMDb – IMDb Privacy Notice		
390	IMDb 000045-46	03/26/2010	Webpage from IMDb – IMDb Privacy Notice		
391	IMDb 000047-48	03/27/2010	Webpage from IMDb – IMDb Privacy Notice		
392			Webpage from IMDb – IMDb Resume for Jean Villepique		
393			Webpage from IMDb – Jason Cermak Profile		
394			Webpage from IMDb – Jean Villepique Profile		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
395			Webpage from IMDb – Jeff Williams Profile		
396			Webpage from IMDb – Jennifer Jane Emerson Profile		
397			Webpage from IMDb – Jill Virnig Profile		
398			Webpage from IMDb – Joan McCall Profile		
399			Webpage from IMDb – Joanne Baron Profile		
400			Webpage from IMDb – Joe Bays Profile		
401			Webpage from IMDb – Jonathan Loughran Profile		
402			Webpage from IMDb – Julia Sanford Profile		
403	Hoang 000016-18	07/10/2012	Webpage from IMDb - Junie Hoang filmography		
404			Webpage from IMDb – Junie Hoang Profile		
405			Webpage from IMDb – Katerina Moutsatsou Profile		
406			Webpage from IMDb – Keith Lyle Profile		
407			Webpage from IMDb – Ken Jeong Profile		
408			Webpage from IMDb – Kyle Scott Jackson Profile		
409			Webpage from IMDb – Linda Wakeman Profile		
410			Webpage from IMDb – Lusia Strus Profile		
411			Webpage from IMDb – Micah Shane Ballinger Profile		
412			Webpage from IMDb – Mitchell Fink Profile		
413			Webpage from IMDb – Monica Malek-Yonan Profile		
414			Webpage from IMDb – Murray Gershenz Profile		
415			Webpage from IMDb – Nathalie Fay Profile		
416			Webpage from IMDb – Nectar Rose Profile		
417	IMDb 000051-52		Webpage from IMDb – Press Room		
418			Webpage from IMDb – Rachael Harris Profile		
419			Webpage from IMDb – Ricky Jay Profile		
420			Webpage from IMDb – Robert Jayne Profile		
421			Webpage from IMDb – Rosie Malek-Yonan Profile		
422			Webpage from IMDb – Rupert Reyes Profile		
423			Webpage from IMDb – Sarah Burns Profile		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
424			Webpage from IMDb – Sasha Barrese Profile		
425			Webpage from IMDb – Scott Cohen Profile		
426			Webpage from IMDb – Shirley Brener Profile		
427			Webpage from IMDb – Stacey Newsome Santiago Profile		
428	IMDb 000058-62		Webpage from IMDb – Submission Guides: Biographical Information		
429			Webpage from IMDb – Tanya Krievins Profile		
430			Webpage from IMDb - The Hunger Games (2012)		
431	IMDb 000068-277		Webpage from IMDb – User Additions Lookup		
432			Webpage from IMDb – William Mesnik Profile		
433	Hoang 000004	11/29/2004	Webpage from IMDb Pro – Junie Hoang: Main Detail		
434			Webpage from IMDb Pro - secureimdbcom signup index		
435			Webpage from IMDb Pro - STARMeter		
436	Hoang 000143	04/25/2012	Webpage from IMDbPro – the Ultimate Business Resource for Entertainment Professionals		
437	Hoang 000013-14	07/10/2012	Webpage from JunieHoang.com - Clipz		
438	Hoang 000015	07/10/2012	Webpage from JunieHoang.com - Contact		
439	Hoang 000007	07/10/2012	Webpage from JunieHoang.com - Home page		
440	Hoang 000006	04/19/2012	Webpage from JunieHoang.com – home page		
441	Hoang 000008	07/10/2012	Webpage from JunieHoang.com - Pictures		
442	Hoang 000009	07/10/2012	Webpage from JunieHoang.com - Pictures		
443	Hoang 000010-12	07/10/2012	Webpage from JunieHoang.com - Publicity		
444			Webpage from Los Angeles Craigslist listing job posting		
445			Webpage from Mandy.com listing job posting		
446	Hoang 000187		Webpage from Now Casting – Junie Hoang’s account with casting (audition) schedule		
447	Hoang 000601-62		Webpage from Now Casting – Now casting list		

Ex. No.	Bates No.	Date	Document	Auth. Obj.	Adm. Obj.
448			Webpage from Screen Actors Guild and AFTRA – Press Release		